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Attorney for County Defendants

IN THE UNITED STATES DISTRICT COURT, DISTRICT OF UTAH
CENTRAL DIVISION

LAURIE S. JENKINS, Plaintiff, v. UTAH COUNTY et al., Defendants.	STIPULATED MOTION TO DISMISS ALL CLAIMS WITH PREJUDICE Case No. 2:11-CV-761 Judge Robert J. Shelby
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Plaintiff, Laurie S. Jenkins, through her attorney, Alyson Carter McAllister, and Defendants Todd McAllister and Vickie Nostrum, including previous defendants awarded summary judgment, through their attorney, Frank D. Mylar move this Court and Stipulate to Dismissal of this entire lawsuit with prejudice based upon a prior settlement agreement. This dismissal is based upon the following stipulation:

1. The parties agree that this case will be costly to litigate at trial and, therefore, have reached a compromise to resolve this litigation. Specifically, the parties do not admit to any infirmity in their respective claims through this settlement. To the contrary, Defendants believe they would ultimately prevail on their claims as does the Plaintiff.

2. The Plaintiffs agree to dismiss this suit with prejudice, forgoing any right to appeal any issue or claim arising out of the allegations of the pleadings.
3. All parties agree to bear their own attorney fees and costs.
4. All parties request that the Court enter its order in conformity with this motion and stipulation, dismissing the entire lawsuit with prejudice including any possible John Doe Defendants.
5. Neither party is considered a prevailing party for any purpose.

Dated this 31st day of August, 2015.

/s/ Alyson Carter McAllister

Alyson Carter McAllister
Attorney for Plaintiff

/s/ Frank D. Mylar

Frank D. Mylar
Attorney for Defendants